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February 20, 2015

Via ECF

The Honorable Nina Gershon
U.S. District Judge
United States District Court
Eastern District of New York
U.S. Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Sabella v. American Stevedoring, Inc. and ILA, Local 1814
Docket No. 1:06-CV-6566-NG-SMG

Dear Judge Gershon,

This firm represents plaintiff, Michael Sabella, with regard to the above-referenced matter. Plaintiff Sabella and defendant ASI have reached a settlement in principle to resolve all outstanding claims between the two parties. The parties are currently working out a few remaining issues with regard to the final written agreement which will memorialize the settlement. At that time, the parties will file a Stipulation of Dismissal with Prejudice with respect to defendant ASI.

The parties currently have opposition papers, with respect to the pending Cross-motions between plaintiff Sabella and defendant ASI, due today. Due to the above developments, Sabella and ASI respectfully request that that all deadlines pertaining to the Cross-motions between plaintiff Sabella and defendant ASI be stayed, pending the amicable resolution of the matter.

Counsel for defendant ASI has consented. Thank you for your consideration of this request.

Very truly yours,

LEVINE & BLIT, PLLC

A handwritten signature in black ink, appearing to read 'R Moriarty', with a stylized flourish at the end.

Russell S. Moriarty, Esq.

Cc (via ECF):

Janine G. Bauer
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